



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

August 6, 2025

**By ECF**

The Honorable Katharine H. Parker  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *International Refugee Assistance Project, Inc. v. United States Citizenship and Immigration Services, et al.*, No. 23 Civ. 1236 (KHP)

Dear Judge Parker:

This Office represents Defendants United States Citizenship and Immigration Services (“USCIS”) and the Department of State (“State,” and together with USCIS, the “Government”) in the above-referenced Freedom of Information Act (“FOIA”) action. We write jointly with Plaintiff International Refugee Assistance Project, Inc. (“IRAP”) in response to the Court’s order to file a joint status report by the eighth day of each month, or if that date is a weekend or public holiday, then on the following Monday.

This matter concerns FOIA requests IRAP submitted to State and USCIS. The USCIS request seeks records for case management software systems used or accessed by USCIS to process a refugee for resettlement to the United States through the U.S. Refugee Admissions Program. The State request seeks the same records with respect to State (“Part One” of the State request), as well as anonymized data from individual refugee cases (“Part Two” of the State request).

With respect to USCIS, as we have noted in previous status reports, USCIS made a release of identified responsive records in July 2023. In recent months, the parties have been discussing whether it is necessary for USCIS to run additional searches. Based on these discussions, USCIS agreed to search for and process certain additional records, and made a production of those records earlier this week, which it expects will complete its response to plaintiff’s request.

With respect to Part One of the State request, State made its nineteenth and final production of records responsive to Part One of the State request on July 25, 2025. With respect to Part Two of the State request, as we noted in our last status report, State produced data via CD mailed to IRAP on May 6, 2025.

IRAP is reviewing the agencies’ productions to determine whether it has any questions about asserted exemptions. If so, the parties plan to discuss such issues between themselves to determine if they can be resolved without litigation.

The parties thank the Court for its consideration of this joint status report and will file their next joint status report by September 8, 2025. If any issue becomes ripe for summary judgment motion practice in the meantime, the party seeking to file the motion will request a pre-motion conference with the Court.

Respectfully,

JAY CLAYTON  
United States Attorney for the  
Southern District of New York

By: /s/ Peter Aronoff  
PETER ARONOFF  
ALYSSA B. O’GALLAGHER  
Assistant United States Attorneys  
Tel.: (212) 637-2697/2822  
Email: Peter.Aronoff@usdoj.gov  
Alyssa.O’Gallagher@usdoj.gov